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Attorneys for Plaintiff and the Proposed Class

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

ANDREW PERRONG and JAMES
EVERETT SHELTON, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

TOMORROW ENERGY CORP fka
SPERIAN ENERGY CORP, a Nevada
corporation, and ENERGY GROUP
CONSULTANTS, INC., a Kansas
corporation, BAETYL GROUP LLC, a Texas
limited liability company,

Defendants.

AND ALL RELATED ACTIONS.

NO. 2:19-cv-00115-RFB-EJY

**DECLARATION OF ADRIENNE D.
McENTEE IN SUPPORT OF
PLAINTIFFS' MEMORANDUM IN
SUPPORT OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPERT
COSTS**

I, Adrienne D. McEntee, hereby declare as follows:

DECLARATION OF ADRIENNE D. McENTEE IN SUPPORT OF PLAINTIFFS'
MEMORANDUM IN SUPPORT OF ATTORNEYS' FEES AND REIMBURSEMENT
OF EXPERT COSTS - 1

Case No. 2:19-cv-00115-RFB-EJY

1 1. I am a member of Terrell Marshall Law Group PLLC (“TMLG”) and counsel of
 2 record for Plaintiffs in this matter. I have personal knowledge of the facts set forth in this
 3 declaration.

4 2. TMLG is a law firm in Seattle, Washington, that focuses on complex civil and
 5 commercial litigation with an emphasis on consumer protection, product defect, civil rights,
 6 employment, wage and hour, and real estate matters. The attorneys of TMLG have extensive
 7 experience in class actions, collective actions, and other complex matters. They have been
 8 appointed lead or co-lead class counsel in numerous cases at both the state and federal level.
 9 They have prosecuted a variety of multi-million-dollar consumer fraud, civil rights, wage and
 10 hour, and product defect class actions.

11 3. TMLG has actively and successfully litigated consumer class action lawsuits.
 12 TMLG has taken the lead in some of the largest nationwide class actions filed under the TCPA,
 13 including those filed against large financial institutions such as Sallie Mae, Bank of America,
 14 Discover Financial Services, Capital One, and HSBC.

15 4. TMLG is litigating or has recently settled the following Telephone Consumer
 16 Protection Class Actions:

- 17 • *In re Capital One Telephone Consumer Protection Act Litigation*—Filed
 18 on behalf of consumers who received automated, prerecorded collection
 19 telephone calls on their cellular telephones without their prior express
 consent. I served as court-appointed interim co-lead counsel. The court
 granted final approval of a \$75,455,098.74 settlement in February 2015.
- 20 • *In re Monitronics International, Inc. Telephone Consumer Protection*
 21 *Act Litigation*—Filed on behalf consumers who received automated,
 22 prerecorded solicitation telephone calls on their residential and business
 23 telephones without their prior express consent within the meaning of the
 Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.*, the
 Washington Automatic Dialing and Announcing Device statute, RCW
 80.36.400, and the Washington Consumer Protection Act, RCW 19.86 *et*
 24 *seq.* I serve as co-lead counsel in the MDL. The case settled on a class-

25 DECLARATION OF ADRIENNE D. McENTEE IN SUPPORT OF PLAINTIFFS’
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 OF EXPERT COSTS - 2

wide basis in 2017 for \$28,000,000, and final approval was granted on June 12, 2018.

- *Abante Rooter and Plumbing, Inc., et al. v. Alarm.com Incorporated, et al.*—TMLG represents two certified classes of consumers who received automated solicitation telephone calls on their cellular and residential telephones without their prior express consent within the meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* The case settled on a class-wide basis for \$28,000,000 and final approval was granted on August 13, 2019.
- *Snyder v. Ocwen Loan Servicing, LLC*—Filed on behalf of consumers who received automated collection telephone calls on their cellular telephones without their prior express consent within the meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* The case settled on a class-wide basis for \$21,500,000 and was finally approved in the United States District Court for the Northern District of Illinois on June 4, 2019.
- *Abante Rooter and Plumbing, Inc. v. Pivotal Payments Inc*— Filed on behalf of small businesses that received automated solicitation telephone calls to their cell phones. The case settled on a class-wide basis for \$9 million and final approval was granted by the United States District Court for the Northern District of California in October 2018.
- *Charvat v. Plymouth Rock Energy*—Filed on behalf of consumers who received automated solicitation telephone calls on their cellular and residential telephones without their prior express consent within the meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* and/or to telephone numbers registered on the National-Do-Not-Call Registry. The case was finally approved in the United States District Court for the Eastern District of New York on July 31, 2018.
- *Melito v. American Eagle Outfitters, Inc.*—Filed on behalf of consumers who received spam text messages on their cellular telephones without their prior express consent within the meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* The case settled on a class-wide basis in 2016 for \$14,500,000, and final approval was granted by the United States District Court for the Southern District of New York in September 2017. The United States Court of Appeals for the Second Circuit affirmed the settlement on April 30, 2019. *Melito v. Experian Mktg. Sols., Inc.*, 923 F.3d 85 (2d Cir. 2019).

- 1 • *Ashack v. Caliber Home Loans*—Filed on behalf of consumers who
2 received automated, prerecorded collection telephone calls on their
3 cellular telephones without their prior express consent within the
4 meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et*
5 *seq.* TMLG negotiated a nationwide settlement in 2016 for \$2,895,000,
6 and final approval was granted in June 2017.
- 7 • *Joseph v. TrueBlue Inc.*—Filed on behalf of consumers who received
8 spam text messages on their cellular telephones without their prior
9 express consent within the meaning of the Telephone Consumer
10 Protection Act, 47 U.S.C. § 227 *et seq.* The case settled on a class-wide
11 basis in 2016 for \$5,000,000, and final approval was granted in March
12 2017.
- 13 • *Gehrich v. Chase Bank USA*—Filed on behalf of consumers who
14 received automated, prerecorded collection telephone calls on their
15 cellular telephones without their prior express consent within the
16 meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et*
17 *seq.* TMLG negotiated a \$34,000,000 nationwide settlement; final
18 approval was granted in March 2016.
- 19 • *Ott v. Mortgage Investors Corporation*—Filed on behalf of consumers
20 who received automated solicitation telephone calls on their cellular and
21 residential telephones without their prior express consent within the
22 meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et*
23 *seq.* TMLG negotiated a \$7,483,600 class-wide settlement and final
24 approval was granted in January 2016.
- 25 • *Wilkins v. HSBC Bank Nevada, N.A.*—Filed on behalf of individuals who
alleged that HSBC made prerecorded calls using an automatic dialing
system. The case settled on a class-wide basis in 2014 for \$39,975,000,
and final approval was granted in March 2015.
- *Rose v. Bank of America Corp.*—Filed on behalf of consumers who
received automated, prerecorded collection telephone calls on their
cellular telephones without their prior express consent within the
meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et*
seq. TMLG negotiated a nationwide settlement of \$32,083,905, which
was granted final approval in August 2014.
- *Steinfeld v. Discover Financial Services*—Filed on behalf of consumers
who received automated, prerecorded collection telephone calls on their
cellular telephones without their prior express consent within the
meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et*
seq. TMLG negotiated an \$8.7 million settlement, which was granted
final approval in March 2014.

- *Arthur v. Sallie Mae, Inc.*—Filed on behalf of consumers who received automated, prerecorded collection telephone calls on their cellular telephones without their prior express consent within the meaning of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* TMLG negotiated a \$24.15 million nationwide settlement, and final approval was granted in 2012.

5. I am the lead attorney from TMLG in this case. I concentrate my practice in complex litigation, including the prosecution of consumer class actions. I graduated from the University of Washington School of Law in 2003, where I was a member of the Pacific Rim Law and Policy Journal and Moot Court Honor Board. Prior to joining TMLG, I was a member of Tousley Brain Stephens PLLC, where I practiced for five years. Before entering private practice, I worked with the King County Prosecuting Attorney's Office, where I prosecuted a broad range of crimes. Since my admission to the bar, I have been a member of the Washington State Bar Association and Washington Women Lawyers' Judicial Evaluation Committee. In 2018 and 2019, I was named to the Washington Super Lawyers list.

6. I was the sole attorney at TMLG to work on the Emergency Motion (ECF No. 113). The Emergency Motion was of the type our firm would typically delegate to an associate. However, because the need to file the motion arose near the holidays, I was unable to delegate the motion work to an associate. Attached as Exhibit 1 are true and correct billing records for the dates associated with time I spent to conduct research, draft the motion, confer with co-counsel regarding the motion, revise the motion, review defendants' responses to the motion, travel to Las Vegas for the January 9th hearing, prepare for the hearing, confer with co-counsel regarding next steps following the hearing, return to Seattle from hearing, review the Court's order, and prepare the memorandum of fees and costs. All of the time expended was directly related to the Emergency Motion, and all of it was necessary. In total, I billed 35.4 hours related to the Emergency Motion.

DECLARATION OF ADRIENNE D. McENTEE IN SUPPORT OF PLAINTIFFS'
MEMORANDUM IN SUPPORT OF ATTORNEYS' FEES AND REIMBURSEMENT
OF EXPERT COSTS - 5

Case No. 2:19-cv-00115-RFB-EJY

1 7. My current rate for class actions is \$650 per hour. My prior rate was \$575. These
2 rates were submitted as part of fee petitions in the following settlements involving the Telephone
3 Consumer Protection Act, which courts finally approved over the last three years: *Ahmed, et al.*
4 *v. HSBC Bank USA, National Association, et al.*, NO. 5:15-cv-2057-FMO-SPx, ECF No. 195-2,
5 ECF No. 204 (C.D. Cal. 2019) (\$650); *Borecki v. Raymours Furniture Company, Inc.*, NO. 1:17-
6 cv-01188 (LAK) (SN), ECF No. 92, ECF No. 98 (S.D.N.Y. 2019) (\$575); *Melito, et al. v.*
7 *American Eagle Outfitters, Inc., et al.*, NO. 1:14-cv-02440-VEC, ECF No. 266, ECF No. 319
8 (S.D.N.Y. 2017) (\$575). TMLG requests a total fee award of \$23,010.00.

9 8. In preparing Exhibit 1, I excluded more than five hours of time incurred by
10 TMLG legal secretary, Bradford Kinsey, in preparing, formatting, and filing the Emergency
11 Motion. TMLG typically bills Mr. Kinsey's time at \$225 per hour.

12 9. The costs associated with my travel to Las Vegas for the Emergency Motion total
13 \$712.44.

14 a. Attached as Exhibit 2 is a true and correct copy of the receipt for my
15 airfare.

16 b. Attached as Exhibit 3 is a true and correct copy of the receipt for my hotel.
17 I checked for lower prices in the area, as the rate was higher than I expected, but was not able to
18 find a lower rate at a nearby hotel with reasonable amenities. I later learned that the influx of
19 patrons to the area may have been due to the 2020 CES Convention, a conference produced by
20 the Consumer Technology Association with more than 170,000 attendees. *See*
21 <https://www.ces.tech/About-CES.aspx>. Also, the invoice shows that I stayed in a suite the
22 evening of January 8th. I did not book a suite. I booked a standard room. But apparently the suite
23 was one of the only rooms available when I checked in at 11 p.m.

24 DECLARATION OF ADRIENNE D. McENTEE IN SUPPORT OF PLAINTIFFS'
25 MEMORANDUM IN SUPPORT OF ATTORNEYS' FEES AND REIMBURSEMENT
OF EXPERT COSTS - 6

Case No. 2:19-cv-00115-RFB-EJY

1 c. Attached as Exhibit 4 are screenshots of the car service I hired to travel to
2 and from McCarran International Airport, and from my hotel to the courthouse.

3 d. Attached as Exhibit 5 is a true and correct copy of the receipt for overnight
4 parking at SeaTac International Airport.

5 10. The Court also ordered that Plaintiffs “submit invoices or billing statements from
6 the individual retained to inspect and image EGC, John Williams, and Tyde Bonaparte’s
7 workstations and EGC’s servers.” ECF No. 125. Attached as Exhibit 6 is the true and correct
8 invoice Plaintiffs received for the expert’s work related to the EGC inspection.

9 11. EGC and Tyde Bonaparte represented that the only work station available for
10 Team Integrity was that of John Williams. As a result, only the work stations of John Williams
11 and former EGC representative, Matt Alexander, were imaged. Moreover, the forensic expert
12 could not perform the scans and searches the parties had planned on EGC’s servers because he
13 received error messages that access was denied. No one at EGC was able to provide the expert
14 with permission or credentials that would allow him access. During the upcoming deposition,
15 Plaintiffs will ask EGC about files with .txt, .csv, and .xls files that the expert identified on the
16 work stations he was able to image. If Plaintiffs are unable to link such files to calls made on
17 Sperian’s behalf, Plaintiffs will request additional relief from the Court.

18 12. I traveled to EGC’s headquarters in Pittsburgh, Kansas to attend the inspection.
19 Pittsburg, KS is a two-hour drive from the Kansas City International Airport. Although the Court
20 did not expressly order EGC to pay expenses incurred by Plaintiffs above and beyond the cost of
21 the expert, TMLG incurred \$672.85 in expenses, which I have itemized here.

22 a. Attached as Exhibit 7 is a true and correct copy of the receipt for my
23 airfare.

24 DECLARATION OF ADRIENNE D. McENTEE IN SUPPORT OF PLAINTIFFS’
25 MEMORANDUM IN SUPPORT OF ATTORNEYS’ FEES AND REIMBURSEMENT
OF EXPERT COSTS - 7

Case No. 2:19-cv-00115-RFB-EJY

b. Attached as Exhibit 8 is a true and correct copy of the receipt for my hotel.

c. Attached as Exhibit 9 is a true and correct copy of the receipt for car rental.

d. Please note that after I booked the reservations set forth in Exhibits 7 through 9, I changed my flight to travel to Kansas City for the weekend prior to the inspection. I did not include any expenses related to the extended part of the trip as part of the motion.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED in Seattle, Washington, this 30th day of January, 2020.

/s/ Adrienne D. McEntee, Admitted Pro Hac Vice
Adrienne D. McEntee, Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I, Adrienne D. McEntee, hereby certify that on January 30, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Ana Tagvoryan
Email: atagvoryan@blankrome.com
Harrison Brown
Email: hbrown@blankrome.com
BLANK ROME LLP
2029 Century Park East, 6th Floor
Los Angeles, California 90067
Telephone: (424) 239-3400
Facsimile: (424) 239-3434

Attorneys for Defendant Sperian Energy Corp.

Adam Knecht
Email: aknecht@alversontaylor.com
ALVERSON TAYLOR & SANDERS
6605 Grand Montecito Parkway, Suite 200
Las Vegas, Nevada 89149
Telephone: (702) 384-7000
Facsimile: (702) 385-7000

Attorneys for Defendant Energy Group Consultants, Inc.

DATED this 30th day of January, 2020.

TERRELL MARSHALL LAW GROUP PLLC

By: /s/ Adrienne D. McEntee, Admitted Pro Hac Vice
Adrienne D. McEntee, *Admitted Pro Hac Vice*
Email: amcentee@terrellmarshall.com
936 North 34th Street, Suite 300
Seattle, Washington 98103
Telephone: (206) 816-6603
Facsimile: (206) 319-5450

Attorneys for Plaintiffs

DECLARATION OF ADRIENNE D. McENTEE IN SUPPORT OF PLAINTIFFS'
MEMORANDUM IN SUPPORT OF ATTORNEYS' FEES AND REIMBURSEMENT
OF EXPERT COSTS - 9

Case No. 2:19-cv-00115-RFB-EJY

— EXHIBIT 1 —

Terrell Marshall Law Group PLLC
Perrong v. Sperian
Matter 2264-001

Date	Initials	Narrative	Units	Rate	Value
Statement Professional: Adrienne McEntee					
12/23/2019	ADM	Revised inspection protocol and scope [.2]; worked on motion for sanctions [5.5]; researched the functionality of the vici dialer [.2].	5.9	\$ 650.00	\$ 3,835.00
12/26/2019	ADM	Worked on motion for sanctions [6.4]; reviewed revisions to search terms, protocol, and scope for inspection [.2].	6.6	\$ 650.00	\$ 4,290.00
12/27/2019	ADM	Reviewed co-counsel's revisions to motion and declaration in support of the same [.3]; call with co-counsel regarding the same [.4]; worked on motion for sanctions and declarations in support of the same [5.1].	5.8	\$ 650.00	\$ 3,770.00
12/30/2019	ADM	Reviewed minute order setting response deadline and hearing for January 9th.	0.1	\$ 650.00	\$ 65.00
1/6/2020	ADM	Reviewed EGC's responses to questions posed on page 2 of the Scope [.2]; call with Neil McLean regarding the inspection [.5]; reviewed EGC's response to motion for sanctions [.2]; reviewed Sperian's response to motion for sanctions [.2].	1.1	\$ 650.00	\$ 715.00
1/8/2020	ADM	Email to counsel for Sperian regarding discovery responses and upcoming Rule 30(b)(6) deposition [.2]; call with counsel for Sperian regarding inspection documents [.2]; traveled to Las Vegas for hearing on sanctions motion [4.5]	4.9	\$ 650.00	\$ 3,185.00
1/9/2020	ADM	Prepared for hearing on sanctions motion [2.0]; traveled to and participated in the same [2.0]; post-hearing meeting with Mr. Friedberg [1.0]; call with Mr. Paronich regarding the same [.5]; traveled from Las Vegas to Seattle [4.5].	9.5	\$ 650.00	\$ 6,175.00
1/21/2020	ADM	Reviewed order on sanctions motion [.2]; traveled to Houston for Sperian deposition [6.5]; call with co-counsel [1.0]	7.7	\$ 650.00	\$ 5,005.00
1/29/2020	ADM	Worked on fee petition; conducted research regarding the same; drafted declaration in support of the same.	3	\$ 650.00	\$ 1,950.00
Statement Professional: Adrienne McEntee			44.6		\$ 28,990.00

— EXHIBIT 2 —

From: [Alaska Airlines](#)
To: [Adrienne McEntee](#)
Subject: [External] Confirmation Letter - KGKLJH 01/08/20 - from Alaska Airlines
Date: Tuesday, December 31, 2019 12:37:22 PM



If you have trouble viewing this message, [click here](#) to request a plain text-only version of this email.

Confirmation code: KGKLJH

You're all set. Thank you for booking with Alaska and we look forward to seeing you on board.

View full details about your flight reservation and fare.

VIEW/MANAGE

Flight	Departs	Arrives	Class	Traveler(s)	Seat(s)
 Alaska 604 Boeing 737-900	Seattle (SEA) Wed, Jan 8 7:45 pm	Las Vegas (LAS) Wed, Jan 8 10:15 pm	T (Coach)	Adrienne McEntee	16D
 Alaska 955 Boeing 737-900	Las Vegas (LAS) Thu, Jan 9 7:30 pm	Seattle (SEA) Thu, Jan 9 10:20 pm	K (Coach)	Adrienne McEntee	16B

Additional information

Prohibited hazardous materials

The Federal Government has specific restrictions about hazardous materials in carry-on and checked baggage. Failure to declare hazardous materials may result in civil and criminal penalties. For more information, visit: [the FAA website](#).

Summary of airfare charges

Adrienne McEntee
 Mileage Plan MVP Gold Member #

New Ticket 0272150857777
 (previous ticket 0272150856503)

New Ticket Value	\$296.60
Additional Amount Due	\$10.00
Per person total	\$10.00

Total charges for air travel **USD \$10.00**

View all [taxes, fees and charges](#)

Total charges and credits

Nonrefundable fare of \$10.00 was charged to the Visa card with number
 held by Adrienne McEntee on 12/31/2019.

Travel insurance by Allianz Global Assistance

Purchase travel insurance benefits and travel assistance services for your trip

— EXHIBIT 3 —



ADRIENNE MCENTEE
 9825 MARINE VW
 OR SW SEATTLE WA 981362731

Room Number: ST 5575
 Arrival Date: 01/08/2020
 Departure Date: 01/09/2020
 Confirmation Number: 438296927065
 Page No: 1 of 2
 Date: 01/29/2020

Date	Description	Charges	Balance
01/08/2020	APPLIED DEPOSIT *****	270.30-	270.30-
01/08/2020	RESORT FEE \$34.00+\$4.42 T	38.42	231.88-
01/08/2020	ROOM CHARGE ST 5575	239.20	
	TAX2	31.10	38.42
01/09/2020	FRONT DESK VISA *****	38.42-	



ADRIENNE MCENTEE
 9825 MARINE VW
 OR SW SEATTLE WA 981362731

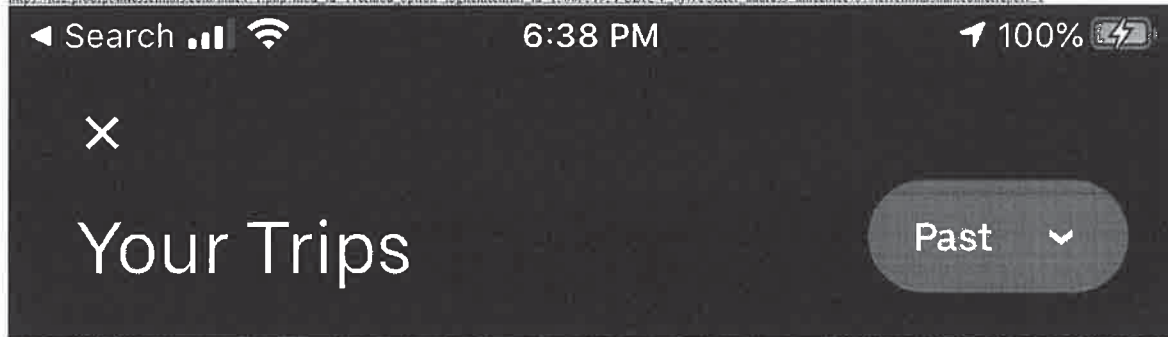
Room Number: ST 5575
 Arrival Date: 01/08/2020
 Departure Date: 01/09/2020
 Confirmation Number: 438296927065
 Page No: 2 of 2
 Date: 01/29/2020

Date	Description	Charges	Balance
SUMMARY OF CHARGES			
	ROOM	273.20	
	TAX2	35.52	
Balance			.00

— EXHIBIT 4 —

From: [redacted]
To: [redacted]
Subject: [redacted]
Date: Wednesday, January 29, 2020 6:39:17 PM
Attachments: Screenshot 2020-01-29 at 6:38:49 PM.png

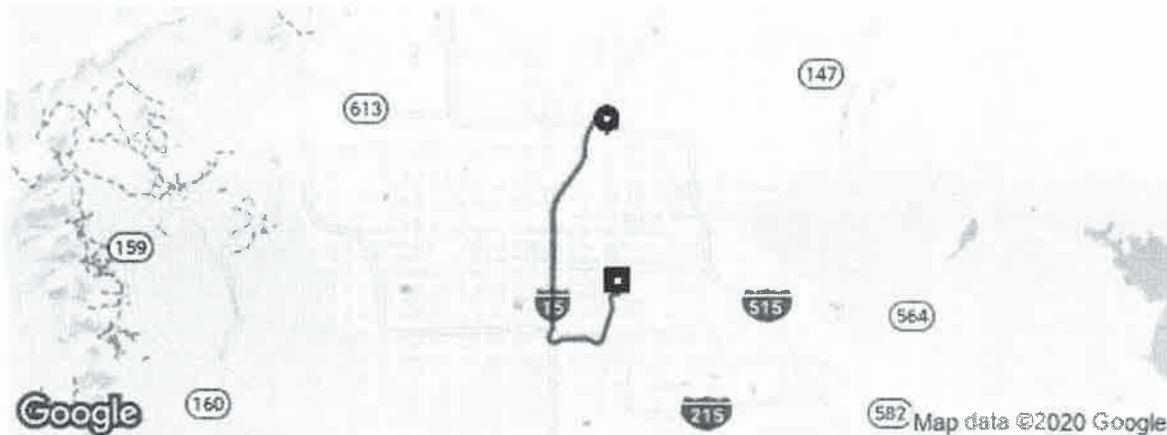
This email has been scanned for spam and viruses by Proofpoint Essentials. Visit the following link to report this email as spam:
[https://us2.proofpointessentials.com/index01.php?mod_id=11&mod_option=logitem&mail_id=1580351951-SB\(UV_8j\)WcOZ&r_address=amccentice%40terrellmarshall.com&report=1](https://us2.proofpointessentials.com/index01.php?mod_id=11&mod_option=logitem&mail_id=1580351951-SB(UV_8j)WcOZ&r_address=amccentice%40terrellmarshall.com&report=1)



1/9/20, 5:16 PM

\$17.41

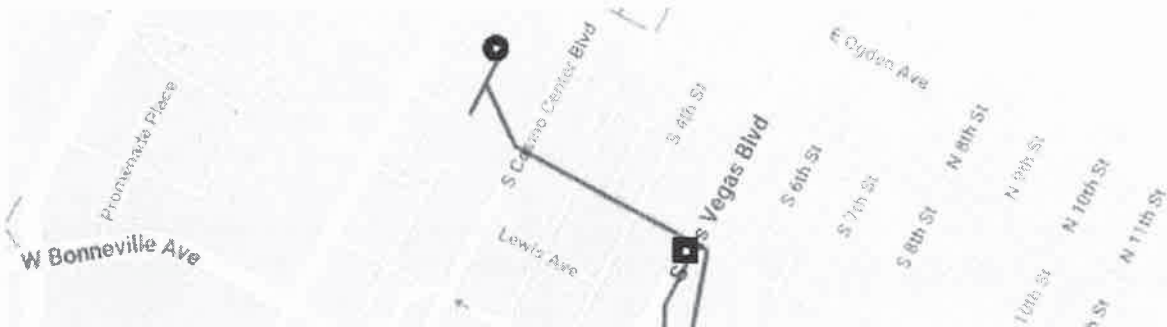
Toyota Highlander 826ZAX



1/9/20, 10:12 AM

\$9.01

Toyota Sienna 321G01





1/8/20, 10:32 PM
Lexus GS 985J46

\$23.70
★★★★★



Sent from my iPhone

— EXHIBIT 5 —



PAYSTATION RECEIPT

Transaction #: 7996162
 PIN #: 9742
 Parker #: None
 Parker Group: None
 In Date/Time: 01/08/20 06:02PM
 Out Date/Time: 01/09/20 10:50PM
 Parking Type: General Parking
 Rate: - GENERAL RATE -
 \$48.86 X 1
 Tax: Sales Tax \$4.89
 Tax: SeaTac Tax \$3.25
 Parking SubTotal: 48.86
 Tax SubTotal: 8.14
 Grand Total: 57.00

Visa (0321) 57.00



— EXHIBIT 6 —

INVOICE

INVOICE # 14585

DATE 01/31/2020

DUE DATE 03/01/2020

TERMS Net 30

BILL TO

Adrienne McEntee

Terrell Marshall Daudt & Willie

Pllc

936 N 34th St Ste 300

Seattle, WA 98103

United States

PLEASE DETACH TOP PORTION AND RETURN WITH YOUR PAYMENT.

DESCRIPTION	QTY	RATE	AMOUNT
Travel Time	4	110.00	440.00
Round trip travel from Kansas City, MO to Pittsburg, KS (Time)			
Mileage	245	0.55	134.75
Round trip from Kansas City, MO to Pittsburg, KS (Miles)			
Technical Time - per hr	8	225.00	1,800.00
On-Site Inspection and Data Preservation at EGC in Pittsburg KS. 9AM-5PM			
Hard Drive	3	100.00	300.00
2-TB Western Digital - My Passport			
Culling Data - per GB	6	50.00	300.00
Culling Data - per GB			
Production - Per GB	2	150.00	300.00
Production_EGCEMAIL_PROD_01 and EGCINSP_PROD_01			
Technical Time - per hr	0.40	225.00	90.00
Telephone conference with Adrienne McEntee regarding updates to inspection scope as dictated by the court in 01/09 hearing.			
Technical Time - per hr	4	225.00	900.00
Craft syntax pursuant to stipulated search parameters in anticipation for on-site server scan and search.			
Technical Time - per hr	0.20	225.00	45.00
Create backup working copy of forensic images created during on-site inspection on January 14, 2020.			
Shipping	1	70.00	70.00
Overnight working copy drives to Perin Investigations for analysis and reporting.			
Technical Time - per hr	1.40	225.00	315.00
On-site inspection overview, project coordination, workflow design, and reporting requirement communications with Erin Perczak at Perin Investigations 01/15/2020-01/21/2020			
Technical Time - per hr	0.40	225.00	90.00
Email communication with Adrienne McEntee and counsel regarding production format; and review of standard ESI Production protocol.			
Technical Time - per hr	1.30	225.00	292.50
On-site inspection summary and report generation.			

Please remit payment to: 1100 Main Street, Suite 2160; Kansas City, MO 64105

If you would like to pay your invoice online or by phone, a 3% convenience fee will be added to your invoice.

EIN: 47-1799181

Technical Time - per hr

Consolidate report and production data from Perin Investigations and Complete Legal; and deliver FTP link for download to counsel via email with content summary.

0.40

225.00

90.00

Culling Data - per GB

Ingestion of documents from local user profiles MA and JW to Explore eDiscovery utility for native processing, OCR, searching, and export to load file format.

173

50.00

8,650.00

Shipping

Shipped Materials- Fedex return of copies of images

1

60.00

60.00

Senior Consulting Service

Perin- Forensic Consulting-Creation of Forensic and eDiscovery Analysis Report

9.02

250.00

2,255.00

Reference: EGC

BALANCE DUE

\$16,132.25

Please remit payment to: 1100 Main Street, Suite 2160; Kansas City, MO 64105

If you would like to pay your invoice online or by phone, a 3% convenience fee will be added to your invoice.

EIN: 47-1799181

— EXHIBIT 7 —

From: [Alaska Airlines](#)
To: [Adrienne McEntee](#)
Subject: [External] Confirmation Letter - FLWGNC 01/13/20 - from Alaska Airlines
Date: Friday, December 27, 2019 4:44:08 PM

If you have trouble viewing this message, [click here](#) to request a plain text-only version of this email.



Confirmation code: FLWGNC

You're all set. Thank you for booking with Alaska and we look forward to seeing you on board.

View full details about your flight reservation and fare.

VIEW/MANAGE

Flight	Departs	Arrives	Class	Traveler(s)	Seat(s)
 Alaska 478 Boeing 737-900	Seattle (SEA) Mon, Jan 13 7:00 am	Kansas City (MCI) Mon, Jan 13 12:34 pm	R (Coach)	Adrienne Mcentee	10C
 Alaska 891 Boeing 737-900	Kansas City (MCI) Wed, Jan 15 1:35 pm	Seattle (SEA) Wed, Jan 15 3:50 pm	R (Coach)	Adrienne Mcentee	16D

Additional information

Prohibited hazardous materials

The Federal Government has specific restrictions about hazardous materials in carry-on and checked baggage. Failure to declare hazardous materials may result in civil and criminal penalties. For more information, visit: [the FAA website](#).

Summary of airfare charges

Adrienne Mcentee

Mileage Plan MVP Gold Member #

Ticket 0272150514079

Base Fare and Surcharges	\$174.88
Taxes and Other Fees	\$41.72
Per person total	\$216.60

Total charges for air travel

USD \$216.60

[View all taxes, fees and charges](#)

Total charges and credits

Nonrefundable fare of \$216.60 was charged to the Visa card with number ***** held by Adrienne Mcentee on 12/27/2019.

Travel insurance by Allianz Global Assistance

Purchase travel insurance benefits and travel assistance services for your trip from [Allianz Global Assistance](#). [Learn more](#)

— EXHIBIT 8 —



Name and Address

MCENTEE, ADRIENNE
936 N. 34TH ST., SUITE 300
SEATTLE, WA 98103

Hotel Address

2001 MAIN STREET
KANSAS CITY, MO 64108

HOME2 SUITES BY HILTON - KANSAS CITY
DOWNTOWN

Reservations
www.home2suites.com or
1-877-6Home02

Confirmation # 54576407

01/15/20 PAGE 1

Room 334/NUJ
Arrival Date 01/13/20
Departure Date 01/15/20
Adult/Child 1/0
Room Rate \$143.10
Rate Plan S-AAA
Honors #
Airline:

DATE	REFERENCE	DESCRIPTION	AMOUNT
01/13/20	267535	*PARKING	\$12.00
01/13/20	267536	GUEST ROOM	\$143.10
01/13/20	267536	RM-STATE TAX	\$13.74
01/13/20	267536	RM-CITY TAX	\$10.73
01/13/20	267536	RM-ARENA FEE TAX	\$1.50
01/14/20	267792	*PARKING	\$12.00
01/14/20	267793	GUEST ROOM	\$143.10
01/14/20	267793	RM-STATE TAX	\$13.74
01/14/20	267793	RM-CITY TAX	\$10.73
01/14/20	267793	RM-ARENA FEE TAX	\$1.50
01/15/20	267899	*****	(\$362.14)
		** BALANCE **	\$0.00

The on-line eFolio is a courtesy informational service, subject to [Privacy Policy](#) and [Site Usage](#); actual folio kept in hotel records.



— EXHIBIT 9 —

From:
To: [Adrienne McEntee](#)
Subject: Fwd: [External] Costco Travel: Confirmation # C369043994
Date: Monday, January 27, 2020 4:18:50 PM

Sent from my iPhone

Begin forwarded message:

From: Costco Travel <customercare@costcotravel.com>
Date: 1/27/20 8:03:32 AM PST
To: yahoo.com
Subject: Costco Travel: Confirmation # C369043994

Thank you for booking with Costco Travel.

Below is your confirmation number and details. Please save this information and have it with you when you pick up your rental car.

- Do you need a hotel stay? [Shop now](#)
- For details on changing or canceling your reservation see our [FAQs](#).
- Remember, Executive Members earn an annual 2% Reward on Costco Travel purchase. [Learn more](#).

Please do not reply to this message. Replies are directed to an unmonitored mailbox.



[Costco Travel](#) | [Vacation Packages](#) | [Cruises](#) | [Rental Cars](#) | [Hotels](#) | [Theme Parks & Specialty](#)

Booking Date: **January 01, 2020**

View/Print Date: **J**

Costco Membership #

Member Name: **ADRIENNE MCENTEE**

Departure Date: **January 13, 2020**



P.O. Box 34404, Seattle, WA 98124-9775

Reservations: [1-888-455-2848](#)

Monday - Friday 05:00 AM - 09:00 PM(Pacific Time)
 Saturday - Sunday 06:00 AM - 05:30 PM(Pacific Time)

Assistance While Traveling: [1-866-317-4711](#)

Monday - Friday 05:00 AM - 09:00 PM(Pacific Time)
 Saturday - Sunday 06:00 AM - 09:00 PM(Pacific Time)

YOUR TRIP INFORMATION

Costco Travel Confirmation Number:

C369043994

Budget Confirmation Number:

21744484US6

RENTAL INFORMATION

Renter Name: **Adrienne McEntee**

Rental Price: **\$94.11**

The price includes savings of up to 30% off Budget base rates.

	Date	Location	Time
Pick-up:	1/13/20	Kansas City	12:30 PM
Drop-off:	1/15/20	Kansas City	12:00 PM
Car Type:	Budget - Intermediate SUV		

Price Summary

Car Rental	\$61.58
Taxes and fees	\$32.53
Total Rental Price	\$94.11

Know Before You Go

- One additional driver fee will be waived for Costco members at locations in the U.S.
- Should you wish to make a change to your reservation, book a new reservation with the updated information and then cancel your original reservation. There are no penalties to cancel at any time.
- The renter must present their Costco membership card at the time of pickup.
- Automobile insurance, optional equipment and other services may be added for an additional cost at the time of pickup.
- Please carefully review your rental agreement at the counter prior to signing to ensure all information, charges and changes, if any, are correct.

ADDITIONAL INFORMATION**Intermediate SUV**

- Ford Escape or similar
- AUTOMATIC transmission, Air conditioning
- Unlimited mileage

Pick-up: **Mon, Jan 13, 2020** **Time:** 12:30 PM
 Kansas City
Drop-off: **Wed, Jan 15, 2020** **Time:** 12:00 PM
 Kansas City
No. of days: 2
BCD#: W852802 **Coupon#:** -
Flight Details: **Airline :** Alaska Airlines **Flight Number :** 478

Location Information**Pick-Up Location**

Kansas City
 703 London Drive
 Kansas City, MO 64153, US
 Ph: 816-243-5757
 Midnight - 01:00 AM
 06:00 AM - Midnight

Drop-Off Location

Kansas City
 703 London Drive
 Kansas City, MO 64153, US
 Ph: 816-243-5757
 Midnight - 01:00 AM
 06:00 AM - Midnight

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[Print Itinerary \(Login Required\)](#)



You have earned approximately \$1.23 towards your Executive Member 2% Reward on this purchase.

Your actual Reward will be calculated and applied on completed travel. Excludes taxes, fees, surcharges, gratuities, trip protection, and portions of travel purchased through a third party such as upgrades, rental car equipment, and similar extras. [View more details](#)